

San Antonio Uniformed Services Health Education Consortium San Antonio, Texas

San Antonio Uniformed Services Health Education Consortium (SAUSHEC) Trainee Supervision Policy

I. Applicability

The SAUSHEC Command Council (Commanders of Brooke Army Medical Center [BAMC] & Wilford Hall Medical Center [WHMC] and the Dean SAUSHEC) and the Graduate Medical Education Committee (GMEC) of SAUSHEC have approved this policy. It applies to all staff physicians, dentists, program directors and trainees of SAUSHEC's teaching hospitals (BAMC and WHMC) and establishes minimum requirements for supervision of trainees who provide medical care to patients at WHMC and BAMC. This instruction applies to all personnel assigned, attached or on contract to BAMC and WHMC. SAUSHEC Graduate Medical Education (GME) program directors will also comply with any additional supervision requirements of their respective Residency Review Committees (RRCs) or accrediting organizations.

II. Definitions and responsibilities.

- A. A trainee is defined as a medical, dental, physical therapy, dietetic, etc. intern; resident or fellow who has graduated from a medical, dental, physical therapy, dietetic, etc. school respectively, and is either in the first or subsequent post graduate training program in a specialty or subspecialty.
- B. A student is someone who is currently enrolled in a medical/osteopathic, dental, physician assistant, physical therapy, etc. school.
- C. A supervising staff provider is a licensed independent practitioner (LIP) who can supervise trainees and students. This is an individual with appropriate training and an unrestricted state license who has privileges in a field, specialty or subspecialty of medicine or dentistry that would allow that individual to practice without supervision at BAMC or WHMC. LIPs may supervise trainees and students in the areas of medical/dental care in which they are privileged, if they are approved to do so by the appropriate Program Director of the SAUSHEC training program and Department Chair (or equivalent) of the MTF. It is supervising staff providers (LIPs) that are ultimately responsible for all aspects of their patient's care within each SAUSHEC training hospital.
- D. "Supervision" constitutes any method of staff oversight of patient care for the purpose of ensuring quality of care and enhancing learning; this term does not necessarily

require the physical presence or the independent gathering of data about the patient on the part of the supervising staff provider.

- E. The term "team" refers to that group of trainees and staff who share responsibility for the care of a given patient.
- F. The term "acutely ill" refers to a patient with a condition that is reasonably expected to threaten life, limb, or major organ function within 24 hours.
- G. The term "major surgical case" is defined as a procedure that enters a major body cavity or has more than a negligible potential for mortality, significant morbidity or significant blood loss. Any procedure performed on a patient with major risks from sedation/anesthesia due to underlying medical problems is also a major case.
- H. Military Treatment Facility (MTF) is a military hospital that is a member of SAUSHEC and in which SAUSHEC residents receive clinical training. Brooke Army Medical Center (BAMC) and Wilford Hall Air Force Medical Center (WHMC) are the two MTF members of SAUSHEC.
- I. Institutional Clinical Authority (ICA) is the institutional official designated in MTF documents as having responsibility for the quality of care provided by LIPs and trainees at that MTF.
- J. San Antonio Uniformed Services Health Education Consortium (SAUSHEC) is the GME sponsoring institution for BAMC & WHMC. The Command Council of SAUSHEC is the Institutional Governing Body (IGB) for military GME in San Antonio. Voting Members of the Command Council are the Commanders of WHMC and BAMC and the Dean of SAUSHEC. The Command Council is ultimately responsible for addressing GME program needs and obligations in planning and decision making and making necessary resources available to programs and ensuring that appropriate resident supervision is provided.
- K. Designated Institutional Official (DIO) is the GME individual recognized by the ACGME and SAUSHEC as having the authority and the responsibility for oversight and administration of the SAUSHEC GME programs. This person is called the Dean of SAUSHEC.
- L. The SAUSHEC Graduate Medical Education Committee (GMEC) is composed of the DIO (who is the Chair), Program Directors, peer selected resident representatives and faculty selected by the Dean. Its charter is to monitor and advise on all aspects of GME in SAUSHEC.
- M. Program Directors are the institutional officials designated by SAUSHEC and recognized by the RRCs as having direct responsibility for all training activities within their training program including the quality of educational experiences provided and appropriate resident supervision.

III. General Principles of Supervision.

A. Careful supervision and observation are required to determine the trainee's ability to gather and interpret clinical information, perform technical procedures, interpretive procedures and to safely manage patients. Although not privileged for independent practice, trainees must be given graded levels of patient care responsibility while at the same time they must be supervised to assure quality care for patients. Each patient must have a responsible attending whose name is recorded in the patient record and who is available to the residents and is involved with and takes responsibility for the patient care being done by the trainees he/she is supervising. Supervision of trainees should be organized so as to provide gradually increased responsibility and maturation into the role of a judgmentally sound, technically skilled, and independently functioning privileged provider. Each SAUSHEC program director will define policies that specify how trainees in that program progressively become independent in specific patient care activities in his/her program while still being appropriately supervised by medical staff. Usually this will be done by a job description for each year of training. The Program Director will also define the evaluation methods used to determine when a resident can progress to the next level of training and when they are competent to graduate.

B. Program supervision policies must be in compliance with this SAUSHEC policy, the bylaws of the Medical Staff of each MTF and with ACGME/RRC/JCAHO policies on resident supervision. Furthermore, Medical Staff governing bodies of BAMC and WHMC routinely update attending responsibilities as they pertain to the supervision of residents. Program supervision policies will delineate the role and responsibilities and patient care activities of trainees and delineate such things as which trainees may write patient care orders, the circumstances under which the may do so, and what entries, if any, must be countersigned by a supervisor (either a staff or a more senior resident). Ultimately, the supervising staff is responsible for the care of the patient and for the conduct and performance of all trainees under their supervision. Exceptions to this may occur when a trainee willfully disregards SAUSHEC/hospital/program policy or the directions of a staff supervisor; conceals his/her intentions or actions from a staff a supervisor; performs medical care outside the scope of normally delegated responsibility without the knowledge and approval of the supervisor; or fails to appropriately perform duties that would generally be expected at his/her level of training without staff knowledge of the specific activities. The program director will insure that all supervision policies are distributed to and followed by trainees and the medical staff supervising their trainees. In addition, supervision policies will be available on the SAUSHEC website.

C. Compliance with resident supervision policies will be monitored by the Program Directors who will report issues to the GMEC, annually in their Metric reports and during the internal reviews. Issues will be reported to the governing bodies of BAMC & WHMC by the Dean at meetings and in the annual GME report. At the end of each academic year, the Program Director will determine if residents can progress to the next higher level of training. This assessment will be documented in their annual assessment of each resident.

D. The GMEC will have representation at appropriate BAMC & WHMC hospital patient care and patient safety committees to insure communication on resident supervision and patient safety issues occurs between the GMEC and the Organized Medical Staff and hospital governing bodies of BAMC & WHMC.

IV. Trainee Supervision in Different Patient Care Settings

A. Supervision of trainees on Inpatient Ward/ICU Teams.

- 1. All lines of authority for inpatient care delivered by inpatient ward/ICU teams will be directed to one privileged staff provider (usually known as the "attending") who will be clearly identified in the medical record. The attending staff provider has the primary responsibility for the medical diagnosis and treatment of the patient. In the interest of continuity of care and effective trainee supervision, inpatient staff rotational schedules should only allow for a maximum of two different staff providers to provide daytime coverage for any one inpatient per week. Trainees may write daily orders on inpatients for which they are participating in the care and these orders will be implemented without the co-signature of a staff physician unless there is a specific restriction in the hospital or ward order writing policy (e.g. chemo orders etc). It is the responsibility of the resident to discuss their orders with senior supervising residents &/or the attending staff physician. Attending staff may write orders on all patients under their care. Trainees will follow all BAMC or WHMC policies and the policies of each patient care area for writing orders including when and how to notify nurses and verbal order procedures.
- 2. General job descriptions, supervision and documentation plans by training year for residents on inpatient services are outlined below. These can be modified by program/service specific job descriptions but they cannot be less restrictive.

a. The PGY1 can

- (1) Take a complete H&P on new admissions (unless otherwise specified by a particular teaching service) and document them in the patient's chart using approved hospital forms or electronic methods. After discussion with the attending physician and/or supervising resident, the PGY1 can write an assessment and initial management plan and institute approved therapeutic interventions.
- (2) Under the supervision of a more senior resident and/or the attending physician, conduct work rounds, write progress notes which include an interim history and physical exam, laboratory and radiographic data, and an assessment and plan. If a significant new clinical development arises, there will be timely communication by a member of the resident team with the attending. The house staff and attending must communicate with each other as often as is necessary to ensure the best possible patient care.

- (3) Be responsible for completion of discharge summaries unless otherwise specified by the Program/service.
- (4) Write transfer notes and acceptance notes between critical care units and floor units unless otherwise specified by the Program/service. Such transfer notes shall summarize the hospital course and list current medication, pertinent laboratory data, active clinical problems and physical exam findings. The supervising resident (if any) and the attending must be involved to make sure that such transfer is appropriate.
- (5) When leaving an inpatient team, write an "off-service" note summarizing the pertinent clinical data about the patient to the oncoming team unless the Program/service has other mechanism to assure communication of patient care data. The new resident team must notify the attending physician of the change in resident teams and review the management plan with him/her.
- b. The PGY2 of an inpatient teaching team can (unless otherwise specified by the program or service):
- (1) Take responsibility for organizing and supervising the teaching service in concurrence with the attending physician and provide the junior residents and medical students under their supervision a productive educational experience. Work directly with the PGY1's in evaluating all new admissions, and reviewing all H&P's, progress notes and orders written by the intern. The PGY2, in consultation with the attending physician, can do direct supervision of interns performing procedures that the PGY2 is qualified to perform. PGY2s may perform any of the PGY1 tasks outlined above at the discretion of the attending or patient care area policies.
- (2) PGY2 residents must maintain close contact with the attending physician of each patient and notify him/her as quickly as possible of any significant changes in the patient's condition or therapy. The physician of record must approve, in advance (except for emergency situations), all significant invasive procedures, costly imaging modalities or those with significant patient risk and all significant therapy decisions or changes.
- c. The PGY3 (and above) of an inpatient teaching team can (unless otherwise specified by the program/service):
- (1) Follow all responsibilities of the PGY2 outlined above when acting in a similar supervisory capacity. PGY3s may perform any of the PGY1 or PGY2 tasks outlined above at the discretion of the attending or patient care area policies.
- (2) Provide assistance with difficult cases, and provide instruction in patient management problems when called upon to do so by other residents. They can assume direct patient care responsibilities when needed to assist more junior residents during times of significant patient volume or severity of illness.

3. Documentation of Staff supervision of Patient Care for hospitalized patients

Staff supervision of patient care must be documented in the inpatient record. Date, time, signatures, and signature stamps (or printing of names) are required on all notes and orders if not performed electronically. Documentation requirements for inpatient care are outlined below.

a. Documentation that must be performed by staff

- (1) For all non short form inpatient admissions, there must be documentation, in writing (dated and timed), by staff of having seen the patient, reviewed the case with residents and the attending's concurrence with the resident's history, physical examination, assessment, treatment plan and orders within 24 hours of admission. Prior to anesthesia (other than local), surgery or major invasive procedure the resident history and physical examination must be signed, dated and timed by the attending physician reflecting the attending physician's concurrence with the exam in advance of the procedure performed. In addition, the record must contain an attending note, (separate from the resident History and Physical) dated and timed prior to performance of any major procedure that states the attending physician has seen the patient and concurs with the History and Physical as written in the record and agrees with the assessment and plan as written in the record. For emergent or urgent situations that require action prior to the physical presence of the attending, the senior inhouse resident must clearly state in the medical record that the attending physician (after discussion by phone) is aware of the procedure and agrees with the plan and the need to proceed ASAP. This note must be dated and timed prior to the procedure. The attending physician should sign this note as soon as physically possible and time and date his/her signature.
- (2) For short form admissions staff must co-sign the short form history and physical or its equivalent on the Abbreviated Medical Record within 24 hours of admission.
- (3) Document concurrence with major therapeutic decisions, such as "Do Not Resuscitate" status, by specific mention in a staff written progress note.
- (4) Staff notes are required at least weekly for non-special care unit patients and in the ICU for any significant change in patient status or change in plan.
- (5) All notes by medical or dental students must be reviewed and cosigned (indicating agreement with content of student note) by a staff provider if not previously signed by a resident.

b. Documentation done by trainees

(1) Trainees must document their patient care and the fact that they are being supervised by writing progress notes and/or co-signing notes written by medical or dental students. The condition of the patient determines how often progress notes are

written. Trainee progress notes are written at least daily on all patients who are acutely ill or are less than five days out from major surgery.

- (2) Documentation of staff supervision can be accomplished in the trainee note by including statements like "Dr. Smith (the attending) is aware and concurs with...") in the following situations:
- (a) For admissions to critical care units, there must be documentation of notification of the admission and concurrence of the staff or fellow with trainee health care plans within four hours of admission.
- (b) For emergent or urgent situations that require action prior to the physical presence of the attending, the senior resident must clearly state in the medical record that the attending physician (after discussion by phone) is aware of the plan/procedure and agrees with the need to proceed. This note must be dated and timed prior to the proposed procedure, and the attending physician should sign this note as soon as physically possible and date and time his/her signature.
- (c) Documenting staff concurrence with discharge plans before the patient is discharged.
- (d) Documenting staff concurrence with decision to transfer patient to another provider, service or facility.
- (e) Documenting staff concurrence with issues dealing with Advance Directives, informed consent and refusal of care.

B. Supervision of Trainees on Inpatient Consult Teams.

All inpatient consultations performed by trainees will be documented in writing with the name of the responsible staff consultant recorded. The responsible staff consultant must be notified verbally by the trainee doing the consult within an appropriate period of time as defined by the particular consulting service. The consulting staff is responsible for all the recommendations made by the consultant team. If requested by the patient's primary staff, the consulting staff must see the patient in a timely manner that is agreeable to both the referring and consulting staff.

C. Supervision of Trainees in the Operating room.

1. The staff physician must be present in the operating room area for the critical parts (including patient and operative site identification) of all major cases. A major case is defined as a procedure that enters a major body cavity or has potential for mortality, significant morbidity or significant blood loss. Any procedure performed on a patient with major risks from sedation/anesthesia due to underlying medical problems will be considered a major case. In some cases, even positioning of the patient may be considered a critical part of an operation in an unstable patient.

2. If, in the opinion of the staff, a surgical procedure is minor and of low potential for significant morbidity & if the resident is deemed competent to perform the procedure without immediate supervision, (as defined in the training program's curriculum) the resident may proceed as directed after proper patient and operative site identification. However, even in his or her absence from the operating room area, the staff physician remains responsible for all aspects the patient's care.

D. Supervision of Trainees in Outpatient clinics.

All outpatient visits provided by trainees will be done under the supervision of a staff provider. This staff provider will interview and examine the patient at the staff's discretion, at the trainee's request, or at the patient's request. The staff doctor has full responsibility for care provided, whether or not he/she chooses to personally verify the trainee interview, examination or laboratory data. The name of the responsible supervising staff will be clearly recorded in the patient or clinic records.

E. Supervision of Trainees in the Emergency Department.

- 1. The responsibility for supervision of trainees providing care in the Emergency Department will be identical to that outlined for supervision of trainees in outpatient clinics (D above).
- 2. The supervision of trainees who are called in consultation on patients in the ED will be identical to that outlined in the scheme for inpatient consultation supervision (B above). Consulting staff should be notified promptly by their trainees of ED consultations.

F. Supervision of Trainees in interpretive settings.

Trainees who do primarily interpretation of laboratory tests, imaging studies or pathology specimens must also be supervised and this supervision must be documented. It is the responsibly of each training program/department in these areas to establish supervisory regulations in compliance with JCAHO & RRC requirements.

V. Supervision of Trainees performing Conscious sedation and invasive procedures.

- A. Conscious sedation will only be performed in the appropriate setting (i.e., where adequate patient monitoring is available, where resuscitation can be readily performed, etc.) and only under the direct supervision of a Licensed Independent Practitioner who is qualified to perform conscious sedation.
- B. A trainee will be considered qualified to perform an invasive procedure without direct line of sight supervision if, in the judgment of the supervising staff (and according to his/her specific training program guidelines), the trainee is competent to safely and effectively perform the procedure. Residents at certain year levels in a training program

may be designated as competent to perform certain procedures under indirect supervision based upon specific criteria defined by the program director. Trainees may perform procedures that they are deemed competent to perform for standard indications without prior approval or direct supervision of staff. However, the patient's staff of record will be ultimately responsible for all procedures on patients. Residents may perform emergency procedures without prior staff approval when life or limb would be threatened by delay. In this case the most senior trainee available will perform of supervise the procedures.

- C. All procedures will have the staff of record documented in the procedure note and that staff will be ultimately responsible for the procedure.
- D. Students will not perform procedures without direct supervision of an LIP or a resident qualified to perform the procedure without direct supervision.

VI. Supervision in Emergency Situations.

- A. An "emergency" is defined as a situation where immediate care is necessary to preserve the life of, or to prevent serious impairment to the health of a patient.
- B. In such situations, any resident is permitted to do everything possible to save the life of a patient or to save a patient from serious harm. Residents will make all reasonable efforts to obtain assistance from more senor residents and/or any staff available in the hospital and will contact the appropriate attending as soon as possible.
- C. The resident will document all aspects of the emergency patient care, including who was contacted, in the patient's record.

VII. Trainee grievances regarding supervision.

- A. It is the Program Directors responsibly to insure that trainees are aware that any concerns they have regarding adequate technical or professional supervision, or professional behavior by their supervisors will be addressed in a safe & non-threatening environment per SAUSHEC and ACGME guidelines.
- B. All SAUSHEC GME programs must follow policies of the SAUSHEC resident grievance policy. Trainee grievance mechanisms will be established for each Department/Training Programs, and will be clearly stated and made available to all trainees during their orientation to that Department/Program in order to ensure that fair and just relationships between students and teachers can be perpetuated.